

NMA:MSA  
F.#2012R01228

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

- - - - -X

UNITED STATES OF AMERICA

- against -

HUGNEL ANDRE,  
also known as "Hugz,"  
Defendant.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE  
(Robbery Conspiracy)

1. On or about March 30, 2011, within the Eastern District of New York and elsewhere, the defendant HUGNEL ANDRE, also known as "Hugz," together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce, and the movement of articles and commodities in commerce by robbery, to wit: the robbery of employees of commercial establishments in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a) and 3551 et seq.)

COUNT TWO  
(Robbery)

2. On or about March 30, 2011, within the Eastern District of New York, the defendant HUGNEL ANDRE, also known as

ROSS, J.  
SCANLON, M.J. FILED  
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U.S. DISTRICT COURT E.D.N.Y.  
★ MAR 27 2013 ★  
INDICTMENT  
BROOKLYN OFFICE

Cr. No. \_\_\_\_\_  
(T. 18, U.S.C.,  
§§ 924(c)(1)(A)(i),  
924(c)(1)(A)(ii),  
981(a)(1)(C), 1951(a), 2  
and 3551 et seq.; T. 21,  
U.S.C., § 853(p); T. 28,  
U.S.C., § 2461(c))

"Hugz," together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce by robbery, to wit: the robbery of employees of a grocery store located at 1789 Linden Boulevard, Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT THREE  
(Robbery)

3. On or about March 30, 2011, within the Eastern District of New York, the defendant HUGNEL ANDRE, also known as "Hugz," together with others, did knowingly and intentionally obstruct, delay and affect commerce, and the movement of articles and commodities in commerce by robbery, to wit: the robbery of employees of a grocery store located at 60 East 55th Street, Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a), 2 and 3551 et seq.)

COUNT FOUR  
(Unlawful Use of a Firearm)

4. On or about March 30, 2011, within the Eastern District of New York, the defendant HUGNEL ANDRE, also known as "Hugz," together with others, did knowingly and intentionally use and carry one or more firearms during and in relation to one or more crimes of violence, to wit: the crimes charged in Counts One through Three, and did knowingly and intentionally possess said

firearms in furtherance of such crimes of violence, which firearms were brandished.

(Title 18, United States Code, Sections 924(c)(1)(A)(i), 924(c)(1)(A)(ii), 2 and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION  
AS TO COUNTS ONE, TWO AND THREE

5. The United States hereby gives notice to the defendant that, upon conviction of any offense charged in Counts One, Two and Three, the government will seek forfeiture, in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), of any property constituting or derived from proceeds obtained directly or indirectly as a result of such offenses.

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third party;

c. has been placed beyond the jurisdiction of the court;

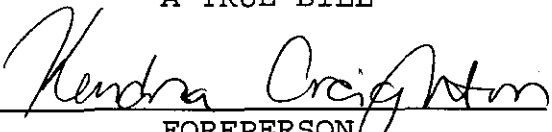
d. has been substantially diminished in value  
or


e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
FOREPERSON

  
LORETTA E. LYNCH  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No.

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**UNITED STATES DISTRICT COURT**

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EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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**THE UNITED STATES OF AMERICA**

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vs.

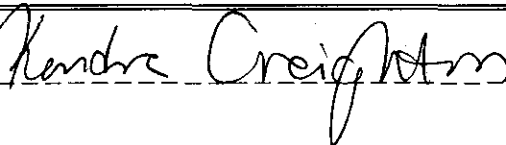
*HUGNEL ANDRE,*

Defendant.

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**INDICTMENT**

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(T. 18, U.S.C., §§ 924(c), 981(a), 1951(a), 2 and 3551 et seq; T. 21, U.S.C. § 853(p); T. 28, U.S.C. § 2461(c).)*A true bill.**Foreman**Filed in open court this* \_\_\_\_\_ *day,**of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_*Clerk**Bail, \$* \_\_\_\_\_

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*Matthew S. Amatruda, Assistant U.S. Attorney (718-254-7012)*